

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

STATE OF TENNESSEE

Plaintiff,
vs.

Case No.: 2:23-cr-20191-MSN

TADARRIUS BEAN

Defendant.

MOTION TO MODIFY CONDITIONS OF RELEASE

Come Now Defendant Tadarrius Bean, by and through counsel moving that this court will modify conditions to lift all restrictions of contact and communication between Defendants.

1. Currently, there is a “no contact” order for the five Defendants involved in this case.
2. The current “no contact”, which implicitly or expressly includes communications is over burdensome to the Defendants that face charges in State and Federal courts.
3. The Court imposed restriction should be lifted, insomuch that the condition is arbitrary and serves no purpose other than to burden the Co-Defendants.
4. There are no concerns, dangers, threats, coercion, or potential undue influence issues or concerns in this case.
5. There are no issues that would concern the safety of others such as names of confidential informants or witnesses that the Court would have safety concerns if the Co-Defendants could communicate.

6. The Defendants, by not being allowed to contact each other are put in a position that is more restrictive than parties that are housed in detention pending trial who are free to converse, discuss, strategies, and have console each other during this stressful period.
7. In short, there is no rhyme or reason for the restrictions.

Statement of Consultation

Counsel for Defendant Bean has consulted with AUSA David Pritchard, who stated that he was not able to agree with Defendants request at this time.

Respectfully submitted,

PERRY GRIFFIN, PC

/s/ John Keith Perry, Jr.

John Keith Perry, Jr., #24283

Attorney for Defendant

5699 Getwell Road. Bldg. G5

Southaven, MS 38672

P: 662-536-6868

F:662-536-6869

JKP@PerryGriffin.com

CERTIFICATE OF SERVICE

I, John Keith Perry, certify that a true and correct copy of the above and foregoing Notice of Appearance unto the following, United States District Attorney for the Western District of Tennessee, via the Court's electronic filing system.

David Pritchard

U.S. ATTORNEY'S OFFICE

Federal Building

167 N. Main St.

Ste. 800

Memphis, TN 38103

Email: david.pritchard2@usdoj.gov

This the 20th day of September 2023

/s/ John Keith Perry, Jr.
JOHN KEITH PERRY, JR.